



OPERATING PERMIT (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued:

Permit Number:

454668P

Date Expires: November 30, 2012

Issued To:

Glenn Springs Holdings, Inc.

Installation Address:

970 Santa Fe Pike
Columbia

Installation Description:

Elemental Phosphorus Production
and Processing Operation

Emission Source Reference No.

**60-0013-
16, 20, 21, 22, 24, 27, 29 & 34
FEE AGREEMENT
CONDITIONAL MAJOR SOURCE**

16: Phosphorous Storage Tanks and Sumps
20: Ferrophosphorus Sizing Operation
21: Steam Generating Boilers
22: Unslaked Lime Storage Tank
24: Phosphorus Transfer from pipeline to Tank Car

27: Ferrophosphorus Crushing Operation
29: Boiler No. 5, SR, H35-250-G
34: Phosphorus Sludge Recovery Process; incl.
Gas-fired Slag Dryer, Afterburner
and Scrubber Controls

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

GENERAL CONDITION:

1. The application that was utilized in the preparation of this permit is dated July 11, 2001 and signed by Mr. John Massey, Operations Manager of the permitted facility. The agreement letter that was utilized in the preparation of this permit is dated October 16, 2002 and signed by Mr. Ralph Schupp, Plant Manager of the permitted facility. If any or both of these persons terminate their employment or are reassigned different duties such that he is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON TRANSFERABLE

POST AT INSTALLATION ADDRESS

SECTION I: The following conditions shall apply to all sections of this permit unless otherwise noted.

2. The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-3-9-.02(11)(a). The permittee would be considered a major source because their current "potential to emit" value for particulate matter was greater than 100 tons per year at the time of application. The permittee has agreed to be subject to limitation(s) in order to be below the major source applicability thresholds for particulate matter of 100 tons per year.
3. Any non compliance with any condition(s) of this permit set to restrain the "potential to emit" below the applicability threshold(s) of 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within three (3) working days of such discovery. This notification, at a minimum, shall include the identification of the source, identification of the permit condition(s) violated and details of the violation.
4. The Permittee is placed on notice that **Conditions 14, 18, 19, 24, 28, 29, 34, and 40** of this operating permit contain limitations that allow the Permittee to opt out of the major source operating permit program requirements specified in Division Rule 1200-3-9-.02(11). Failure to abide by these limits will not only subject the Permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.

Compliance with **Conditions 14, 18, 19, 24, 28, 29, 34, and 40** assures that the installation will be below the major source applicability thresholds for particulate matter (TSP) of 100 tons per year. For **Conditions 14, 18, 19, 24, 28, and 34**, this assurance is based on EPA Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition. For **Condition 29**, this assurance is based on the recordkeeping required by **Condition 30**. For **Condition 40**, this assurance is based on operation of a control device as specified in **Condition 40**.

Table 1 shows each emission source's potential to emit particulate matter (TSP), which has a major source applicability threshold of 100 tons per year. Table 2 shows the maximum emissions of these pollutants from the same emission sources based on limits and operational conditions affirmed by the owner in an agreement letter dated October 16, 2002.

Table 1: Potential to Emit or Maximum Allowable Emissions of TSP in Tons per Year (uncontrolled)								
Pollutant	Emission Source Numbers 60-0013-16, 20, 21, 22, 24, 27, 29 & 34 (See Installation Description on page 1 for Source Descriptions)							
	20	21	22	24	27	29	34	Total
TSP	70 ⁽¹⁾	0.7 ⁽²⁾	75.7 ⁽³⁾	0.0 ⁽⁴⁾	59.3 ⁽⁵⁾	0.4 ⁽⁶⁾	3,183 ⁽⁷⁾	3,389.1

Notes:

- (1) Based on actual emissions and control efficiency information in the permit application dated 6/27/96.
- (2) Refer to information in **Conditions 17, 18, and 19**.
- (3) Based on the design capacity listed in **Condition 23** and a PM (Total) emission factor for "Cement unloading to elevated storage silo (pneumatic)" (uncontrolled) of 0.72 lb/ton of material throughput, from Table 11.12-2 in Section 11.12 of Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, dated 10/01, published by the U.S. Environmental Protection Agency. This emission factor is used to generate a conservative estimate of the emissions from this source.
- (4) Based on information contained in the application dated May 15, 2002.
- (5) Based on the maximum regulatory allowable emissions as stated in TAPCR 1200-3-7-.03.
- (6) Refer to information in **Conditions 33 and 34**.
- (7) Based on actual emissions and control efficiency information in the permit application dated 3/31/99.

Table 2: New Allowable Emissions of TSP in Tons per Year (With Controls where applicable, Based on Agreement Letter)								
Pollutant	Emission Source Numbers 60-0013-16, 20, 21, 22, 24, 27, 29 & 34 (See Installation Description on page 1 for Source Descriptions)							
	20	21	22	24	27	29	34	Total
TSP	24.2 ⁽¹⁾	0.7 ⁽²⁾	0.2 ⁽³⁾	0.0 ⁽⁴⁾	5.0 ⁽⁵⁾	0.4 ⁽⁶⁾	42.3 ⁽⁷⁾	72.8

Notes:

- (1) Based on the emission limitation of **Condition 14**.
- (2) Uncontrolled. Refer to information in **Conditions 17, 18, and 19**.
- (3) Based on the design capacity listed in **Condition 23** and a PM (Total) emission factor for "Cement unloading to elevated storage silo (pneumatic)" (controlled) of 0.00099 lb/ton of material throughput, from Table 11.12-2 in Section 11.12 of Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, dated 10/01, published by the U.S. Environmental Protection Agency. This emission factor is used to generate a conservative estimate of the emissions from this source.
- (4) Based on information contained in the application dated May 15, 2002.
- (5) Based on the stated design capacity from **Condition 27**, the operating time limitation of **Condition 29**, and a PM (Total) emission factor for "Fines crushing" (uncontrolled) of $(0.015 \times 2.1 = 0.0315)$ lb/ton of material throughput, from Table 11.19.2-2 in Section 11.19.2 of Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, dated 1/95, published by the U.S. Environmental Protection Agency. This emission factor is used to generate a conservative estimate of the emissions from this source.
- (6) Uncontrolled. Refer to information in **Conditions 33 and 34**.
- (7) Based on the emission limitation of **Condition 40**.

5. A report stating the compliance status of this source or facility with **Conditions 29 and 40** shall be submitted by March 31 of every year. This report shall cover the preceding calendar year, and shall include the records required by **Conditions 30 and 40**. In addition, the report shall include a statement of certification of compliance with **Condition 9** to indicate proper control equipment operation. If compliance with **Condition 9** was not maintained at all times, the permittee shall attach a narrative that explains the period(s) of noncompliance. This report shall be mailed to the following address:

Field Office Manager
Tennessee Division of Air Pollution Control
Columbia Field Office
2484 Park Plus Drive
Columbia, TN 38401

6. Should proof of compliance for the pollutant(s) with emission limitation(s) placed on this permit be required, the emissions measuring test method(s) and procedure(s) are the following:

Pollutant or Parameter	Testing Methodology
Particulate Matter	EPA Method 5 as published in the current 40 CFR 60, Appendix A

7. Fugitive emissions from all sources in this installation shall be controlled as specified in Rule 1200-3-8-.01. Specifically, no person shall cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-3-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.
8. Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control devices. Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years.
9. The operation(s) controlled by the air pollution control device(s) shall not operate unless the control device(s) is (are) in operation. In the event a malfunction / failure of these control device(s) occurs, the operation of the process(es) controlled by these control device(s) shall be regulated by Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.

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10. This permit supersedes any previous operating permits for this installation.
11. The Permittee shall apply for renewal of this permit not less than 60 days prior to the permit's expiration date.

SECTION II: SOURCE SPECIFIC CONDITIONS.

60-0013-16: Phosphorus Storage Tanks and Sumps PES no. F6

12. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution control Board on August 24, 1984.

60-0013-20: Ferrophosphorus Sizing PES no. M-2 Ball Mill System With 2 Baghouses

13. The stated design capacity of this source is 4000 pounds per hour of Ferrophos. The Technical Secretary may require the permittee to prove compliance with this rate.
14. Particulate matter emitted from this source shall not exceed 0.25 grains per dry cubic foot of stack gases corrected to 70°F and 1 atmosphere; 5.52 pounds per hour; and 24.2 tons during any 12 consecutive months. This emission limitation is established pursuant to Rules 1200-3-07-.03, 1200-3-07-.04, and 1200-3-9-.02(11)(a); and information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the stated design capacity from **Condition 13**, information in the application dated 6/27/96 (i.e., volumetric flowrate of 3,720 cubic feet per minute at 94°F), and the following information from Section 11.19.2 (dated 1/95) of Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, published by the U.S. Environmental Protection Agency (AP-42):
- a. (From Table 11.19.2-2) Estimated fines crushing (controlled) PM (Total) emission factor of $(0.0020 \times 2.1 = 0.0042)$ lb/ton of material throughput. This emission factor is used to generate a conservative estimate of the emissions from this source.
15. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution control Board on August 24, 1984.

60-0013-21: Steam Generating Boilers: # 1D and # 2J, Total Input Capacity 22.0 Million Btu per Hour

16. Natural gas only shall be used as fuel for this source.
17. The maximum heat input rate shall not exceed the following:

Boiler	Maximum Heat Input
Boiler No. 1D	8.4 Million Btu per Hour
Boiler No. 2J	13.6 Million Btu per Hour

The Technical Secretary may require the permittee to prove compliance with these rates.

18. Particulate matter emitted from Boiler # 1D shall not exceed 0.600 pounds per million BTU of heat input, 0.1 pounds per hour and 0.5 ton during any 12 consecutive month period. This emission limitation is established pursuant to Rules 1200-3-6-.02 and 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations; and the information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the heat input rate listed in **Condition 17** and the following information from Section 1.4 (dated 7/98) of AP-42:
- a. (From Table 1.4-2) PM (Total) emission factor of $7.6 \text{ lb}/10^6 \text{ scf}$
- b. Natural gas heating value of 1,020 Btu per scf

19. Particulate matter emitted from Boiler # 2J shall not exceed 0.600 pounds per million BTU of heat input, 0.1 pound per hour and 0.5 ton during any 12 consecutive month period. This emission limitation is established pursuant to Rule 1200-3-6-.02 and Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations; and the information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the heat input rate listed in **Condition 17** and the following information from Section 1.4 (dated 7/98) of AP-42:
- a. (From Table 1.4-2) PM (Total) emission factor of 7.6 lb/10⁶ scf
 - b. Natural gas heating value of 1,020 Btu per scf
20. Sulfur dioxide (SO₂) emitted from Boiler # 1D shall not exceed 5.0 pounds per million BTU of heat input and 4.36 pounds per hour. This emission limitation is established pursuant to Rules 1200-3-14-.02(2)(a) and 1200-3-26-.02(6)(b) of the Tennessee Air Pollution Control Regulations; and information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the heat input rate listed in **Condition 17** and the following information from Section 1.4 (dated 7/98) of AP-42:
- a. (From Table 1.4-2) SO₂ emission factor of 0.6 lb/10⁶ scf
 - b. Natural gas heating value of 1,020 Btu per scf
21. Sulfur dioxide (SO₂) emitted from Boiler # 2J shall not exceed 5.0 pounds per million BTU of heat input and 2.0 pounds per hour. This emission limitation is established pursuant to Rules 1200-3-14-.02(2)(a) and 1200-3-26-.02(6)(b) of the Tennessee Air Pollution Control Regulations; and information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the heat input rate listed in **Condition 17** and the following information from Section 1.4 (dated 7/98) of AP-42:
- a. (From Table 1.4-2) SO₂ emission factor of 0.6 lb/10⁶ scf
 - b. Natural gas heating value of 1,020 Btu per scf
22. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution control Board on August 24, 1984.
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| 60-0013-22: Unslaked Lime Storage Tank Bag Filter Dust Collector (Water Treatment Plant) |
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23. Capacity shall not exceed 48,000 pounds per hour. The Technical Secretary may require the permittee to prove compliance with this rate.
24. Particulate matter emitted from this source shall not exceed 0.25 grains per dry cubic foot of stack gases corrected to 70°F and 1 atmosphere; 0.04 pounds per hour; and 0.2 tons during any 12 consecutive month period. This emission limitation is established pursuant to Rules 1200-3-07-.03, 1200-3-07-.04 and 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations; and the information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the design capacity listed in **Condition 23**, information in the application dated 6/27/96 (i.e., volumetric flowrate of 20 cubic feet per minute), and the following information from Section 11.12 (dated 10/01) of AP-42:
- a. (From Table 11.12-2) Estimated "Cement unloading to elevated storage silo (pneumatic)" (controlled) PM (Total) emission factor of 0.00099 lb/ton of material throughput. This emission factor is used to generate a conservative estimate of the emissions from this source.
25. Visible emissions shall not exceed 20% opacity as specified in Rule 1200-3-5-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

60-0013-24: Phosphorus Transfer from Pipeline to Tank Car. Closed Dome Loading

26. According to information submitted by the permittee on May 3, 2002 and May 15, 2002, this loading procedure has been changed from open dome rail car flooding to closed dome loading, generating no air contaminant emissions.

60-0013-27: PES No. 27, Ferrophosphorus Sizing, Jaw Crusher- Wet Suppression Control

27. The stated design capacity of this source is 17000 pounds per hour of Ferrophos. The Technical Secretary may require permittee to prove compliance with this rate.
28. Particulate matter emitted from this source shall not exceed 13.53 pounds per hour and 5.0 tons during any 12 consecutive months. This emission limitation is established pursuant to Rule 1200-3-07-.03, Rule 1200-3-9-.02(11)(a) and information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the stated design capacity from **Condition 27** and the following information from Section 11.19.2 (dated 1/95) of AP-42:
- (From Table 11.19.2-2) Estimated fines crushing (uncontrolled) PM (Total) emission factor of $(0.015 \times 2.1 = 0.0315)$ lb/ton of material throughput. This emission factor is used to generate a conservative estimate of the emissions from this source.
29. The operating time for this source shall not exceed 740 hours during any 12 consecutive months. This operation limitation is established pursuant to Rule 1200-3-9-.02(11)(a) and information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured by the recordkeeping required by **Condition 30**.
30. A record of the operating time for this source, in the following format or an alternative format approved by the Technical Secretary in writing, must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This record must be retained for a period of not less than five years.

MONTHLY OPERATING HOURS LOG FOR 60-0013-27			
MONTH:		YEAR:	
DATE	HOURS	DATE	HOURS
1		16	
2		17	
3		18	
4		19	
5		20	
6		21	
7		22	
8		23	
9		24	
10		25	
11		26	
12		27	
13		28	
14		29	
15		30	
		31	
TOTAL OPERATING HOURS FOR THE MONTH:			

[illegible]

(1) The operating hours per 12 consecutive months value is the sum of the operating hours in the 11 months preceding the month just completed + the operating hours in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month, it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 operating hours in 2 months].

31. Visible emissions from this source shall not exceed 20 percent opacity as determined by EPA Method 9, in the current 40 CFR 60, Appendix A. (6 minute average)

60-0013-29: Boiler No. 5 SR, H35-250-G Natural Gas Fired, 10.46 Million BTU per Hour

32. Natural gas only shall be used as fuel for this source.
33. The maximum rated heat input capacity for this source shall not exceed 10.46 Million BTU per hour.
34. Particulate matter emitted from this source shall not exceed 0.1 pounds per hour and 0.4 tons during any 12 consecutive month period. This emission limitation is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the heat input rate listed in **Condition 33** and the following information from Section 1.4 (dated 7/98) of AP-42:
 - a. (From Table 1.4-2) PM (Total) emission factor of 7.6 lb/10⁶ scf
 - b. Natural gas heating value of 1,020 Btu per scf
35. Sulfur dioxide (SO₂) emitted from this source shall not exceed 15.0 pounds per hour. This emission limitation is established pursuant to Rule 1200-3-26-.02(6)(b) of the Tennessee Air Pollution Control Regulations and information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the heat input rate listed in **Condition 33** and the following information from Section 1.4 (dated 7/98) of AP-42:
 - a. (From Table 1.4-2) SO₂ emission factor of 0.6 lb/10⁶ scf
 - b. Natural gas heating value of 1,020 Btu per scf
36. Visible emissions from this source shall not exceed 20 percent opacity as determined by EPA Method 9 in the current 40 CFR 60, Appendix A. (6 minute average).

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60-0013-34 Phosphorus Sludge Recovery Process; including Gas-fired Slag dryer.
Gas-fired Afterburner and Venturi Scrubber Controls.

37. Only natural gas shall be used as fuel for this source.
38. The natural gas usage rate shall not exceed the following:

Equipment	Design Natural Gas Usage Rate
Afterburner	600 Standard Cubic Feet per Hour
Dryer	9200 Standard Cubic Feet per Hour

The Technical Secretary may require the permittee to prove compliance with these rates.

39. The stated design input capacity for this source is 14.0 tons per hour, on a daily average basis. The Technical Secretary may require the permittee to prove compliance with this rate.
40. Particulate matter emitted from this source shall not exceed 0.25 grain per dry standard cubic foot of exhaust gas, 9.66 pounds per hour and 42.3 tons during any 12 consecutive month period. This emission limitation is established pursuant to Rule 1200-3-7-.04(2) and Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations. Compliance with this requirement is assured by:
- Maintaining a minimum process water flow rate of 67 gallons per minute in Stage 1 of the Venturi Scrubber;
 - Maintaining a minimum process water flow rate of 40 gallons per minute in Stage 2 of the Venturi Scrubber; and
 - Maintaining a minimum pressure drop of 50 inches of water across the venturi scrubber.

The water flow rate in Stage 1 and Stage 2 of the venturi scrubber, and the pressure drop across the venturi scrubber shall all be recorded once daily when this source is in operation. A log of information in the following format, or an alternative format approved by the Technical Secretary in writing, must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. This log must be retained for a period of not less than five years.

Date	Time	Venturi Scrubber Stage 1 Liquid Flowrate, gallons per minute	Venturi Scrubber Stage 2 Liquid Flowrate, gallons per minute	Venturi Scrubber Pressure Drop, inches of water

41. Sulfur dioxide (SO₂) emitted from this source shall not exceed 0.1 pound per hour. This emission limitation is established pursuant to Rule 1200-3-26-.02(6)(b) of the Tennessee Air Pollution Control Regulations and information contained in the agreement letter dated October 16, 2002. Compliance with this requirement may be assured based on the fuel use rates listed in **Condition 38** and the following information from Section 1.4 (dated 7/98) of AP-42:
- (From Table 1.4-2) SO₂ emission factor of 0.6 lb/10⁶ scf
 - Natural gas heating value of 1,020 Btu per scf

42. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity as determined by EPA Method 9, as published in the Federal Register, Volume 39, Number 219 on November 12, 1974. (six-minute average)

(END OF CONDITIONS)

Conditional Major through Operating Permit (Conditional Major) no. 443759M

Revisions from previous permit no. 443759M

1. Deleted Sources 10, 11, 15, 23 and 25 upon permittee's request and notification of removal.
2. Deleted Boiler #4 from Source 21 upon permittee's request and notification of removal.
3. Added source 34 from construction permit no.951350P.
4. Updated Particulate matter emission limitations for Source 21 based on the most recent AP-42 Section 1.4, dated 7/98. Reference is made to AP-42 for compliance demonstration for TSP and SO₂ emission limitations.
5. Updated Particulate matter emission limitations for Source 22 and referred to AP-42 Section 11.12, dated 10/01, for demonstration of compliance.
6. Removed emission limitations for Source 24 based on information received from the permittee that indicates that this is now a closed process, with no emissions.
7. For Source 27, reference is made to AP-42 Section 11.19, dated 1/95, for demonstration of compliance with particulate matter emission limitation.
8. Updated Particulate matter emission limitations for Source 29 based on the most recent AP-42 Section 1.4, dated 7/98. Reference is made to AP-42 for demonstration of compliance with TSP and SO₂ emission limitations.